



February 2, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

*Re: GN Docket No. 14-28*

Dear Ms. Dortch,

Wired or Wireless, Inc. provides broadband Internet to predominantly rural areas across North Idaho and Eastern Washington. Our service area covers more than 22, 500 square miles and includes nearly 100 towers and relays of which we use unlicensed spectrum that we share with other unlicensed users. Many of these rural areas would not be reachable by anything other than satellite which is a poor substitution for broadband Internet. This is no easy feat in a company with less than 15 employees that has complied with the open Internet rules that were adopted in 2010. Wired or Wireless, Inc. has never received universal service support and quite frankly we are not equipped to handle increases in disclosure obligations and enforcement risk.

I believe in an open Internet in which lawful content is not blocked and that you do not receive payment for prioritizing a content provider's traffic.

The debate at the FCC has focused on large ISPs and large edge providers, which have different views on whether the existing rules adopted in 2010 are sufficient, or whether more heavy-handed, utility-style regulation is necessary. Lost in this discussion is how any new rules would affect small businesses, like mine, that serve consumers in rural areas where consumers have little or no choice. The FCC has proposed to dramatically increase the amount of disclosure and reporting an ISP would be required to



do, but has failed to identify any bad behavior that could warrant stepped-up compliance. In addition, the FCC has yet to assess the increased costs of compliance and the enforcement risk that small ISPs would face.

The FCC is considering regulating ISPs as common carriers under Title II of the Communications Act, but has not considered the costs associated with ongoing forbearance proceedings and the uncertainty that will result from litigation. As far as I can tell, the FCC has not considered whether inclusion in the universal service program – a Title II subsidy program – would impact consumers by forcing increases in their broadband bills. In short, I fear that the FCC may adopt a “one-size-fit-all” regulatory approach that would seriously cripple my ability to continue to provide vital broadband service to the public. Title II will discourage broadband deployment, not encourage it like 706 will.

What I would like to see is an exemption from any new disclosure and reporting obligations for small businesses. If the FCC adopts Title II, small businesses should be exempt from all Title II regulations. In fact it would be beneficial for the FCC to wait before it adopts rules which will give time to address small business issues and give Congress time to act.

I implore you to think twice before passing rules that WILL devastate small business and the families that those small businesses support.

William B. Geibel Jr.

President

Wired or Wireless, Inc.